

**UNITED STATES DISTRICT COURT FOR  
THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO,

Debtor.<sup>1</sup>

PROMESA  
Title III

No. 17 BK 3283-LTS  
(Jointly Administered)

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

PUERTO RICO HIGHWAYS &  
TRANSPORTATION AUTHORITY,

Debtor.

PROMESA  
Title III

No. 17 BK 3567-LTS

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<sup>1</sup> The Debtors in these Title III cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17- BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17- BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO,

Plaintiff,

v.

AMBAC ASSURANCE CORPORATION,  
ASSURED GUARANTY CORP., FINANCIAL  
GUARANTY INSURANCE COMPANY, and U.S.  
BANK TRUST NATIONAL ASSOCIATION, as  
Trustee,

Defendants.

Adv. Proc. No. 20-00003-LTS

PROMESA  
Title III

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO,

Plaintiff,

v.

AMBAC ASSURANCE CORPORATION,  
ASSURED GUARANTY CORPORATION,  
FINANCIAL GUARANTY INSURANCE  
COMPANY, and THE BANK OF NEW YORK  
MELLON, as Fiscal Agent,

Defendants.

Adv. Proc. No. 20-00004-LTS

PROMESA  
Title III

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO,

Plaintiff,

v.

AMBAC ASSURANCE CORPORATION,  
ASSURED GUARANTY CORP., ASSURED  
GUARANTY MUNICIPAL CORP., NATIONAL  
PUBLIC FINANCE GUARANTEE  
CORPORATION, FINANCIAL GUARANTY  
INSURANCE COMPANY, PEAJE INVESTMENTS  
LLC, and THE BANK OF NEW YORK MELLON,  
as Fiscal Agent,

Defendants.

Adv. Proc. No. 20-00005-LTS  
PROMESA

Title III

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO  
RICO,

as representative of

PUERTO RICO HIGHWAYS AND  
TRANSPORTATION AUTHORITY

and

THE OFFICIAL COMMITTEE OF UNSECURED  
CREDITORS OF ALL TITLE III DEBTORS  
(OTHER THAN COFINA AND PBA),

Plaintiffs,

v.

AMBAC ASSURANCE CORPORATION,  
ASSURED GUARANTY CORP., ASSURED  
GUARANTY MUNICIPAL CORP., NATIONAL  
PUBLIC FINANCE GUARANTEE  
CORPORATION, FINANCIAL GUARANTY

Adv. Proc. No. 20-00007-LTS

PROMESA  
Title III

INSURANCE COMPANY, PEAJE INVESTMENTS LLC, and THE BANK OF NEW YORK MELLON, as Fiscal Agent,

Defendants.

**MOTION SUBMITTING STIPULATION AND PROPOSED AMENDED PROTECTIVE ORDER**

Ambac Assurance Corporation, Assured Guaranty Corp., Assured Guaranty Municipal Corp., National Public Finance Guarantee Corporation, and Financial Guaranty Insurance Company (“Monoline Movants”) hereby respectfully state and request as follows, on behalf of all parties to the *Stipulation and Protective Order* (ECF No. 12912) (the “Protective Order”):

1. On April 17, 2020, the Parties,<sup>2</sup> through counsel, stipulated to the entry of the Protective Order to facilitate the production of documents in connection with the Lift Stay Motions while protecting confidential information from improper disclosure and use. (ECF No. 12876.) On April 21, 2020, the Court approved and entered the Protective Order.

2. The Parties have stipulated to the entry of an amended protective order (“Amended Protective Order”), a copy of which is attached hereto as **Exhibit A**, to, *inter alia*, allow discovery that was originally produced with respect to the Lift Stay Motions to be used in connection with the revenue bond adversary proceedings, specifically: *Financial Oversight and Management Board for Puerto Rico v. Ambac Assurance Corporation*, Adv. Proc. No. 20-00003-LTS; *Financial Oversight and Management Board for Puerto Rico v. Ambac Assurance Corporation*, Adv. Proc. No. 20-00004-LTS; *Financial Oversight and Management Board for Puerto Rico v. Ambac Assurance Corporation*, Adv. Proc. No. 20-00005-LTS; and *Financial Oversight and*

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<sup>2</sup> The term the “Parties” and other defined terms have the meanings given to them in the Protective Order, unless otherwise specified herein. “ECF No.” refers to docket entries in Case No. 17 BK 3283-LTS, unless otherwise indicated.

*Management Board for Puerto Rico v. Ambac Assurance Corporation*, Adv. Proc. No. 20-00007-LTS (the “Revenue Bond Adversary Proceedings”), and to allow use in connection with the Lift Stay Motions of any discovery that is produced or to be produced in connection with the Revenue Bond Adversary Proceedings.

3. Consistent with the Court’s *Joint Standing Order on Sealing and Redacting* (ECF No. 13396), paragraph 21 of the Amended Protective Order has been revised to reflect that parties must request leave to submit documents under seal.

4. **WHEREFORE**, the Monoline Movants respectfully request that the Court take notice of the foregoing and adopt the proposed Stipulation and Amended Protective Order attached as **Exhibit A**.

*[Remainder of Page Intentionally Omitted]*

Dated: June 16, 2020  
San Juan, Puerto Rico

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**CERTIFICATE OF SERVICE**

I hereby certify that on this same date a true and exact copy of this notice was filed with the Clerk of Court using the CM/ECF system, which will notify a copy to counsel of record.

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